

## Template for comments and observations

Date: July 23, 2015 –  
November 30, 2015

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Paragraph	Commented text	Proposed change	Comment (justification for change)
A1 Definitions		Add definition of accessory so that it is easier to calculate the % of, for example, GRS products	
Added: "Accessory: Supplemental items added to a product for decorative or functional reasons (e.g. embroidery, buttons, zippers). May also be referred to as a "trim."			
A1 Definitions		I would add ISO definition, Certification – the provision by an independent body of written assurance (a certificate) that the product, service or system in question meets specific requirements. <a href="http://www.iso.org/iso/home/standards/certification.htm">http://www.iso.org/iso/home/standards/certification.htm</a>	
Added: "The provision by an independent body of written assurance (a certificate) that the product, service or system in question meets specific requirements.			
A1 Definitions	Final Processor: The certified Organization that performs the final point of manufacturing, including any addition of trims or accessories that will be labeled for sale to consumers.	The certified Organization that performs final point of labeling and packaging for sale to consumers.	
Changed to "The certified Organization that performs the final point of product transformation – including any addition of hangtags or product labeling that indicates Certification – before sale to consumers."			
A1 Definitions	Post-Production: All activities that occur after final product manufacturing that requires no further transformation or processing before being sold to the final consumer. Any addition of trims or accessories, packaging, and labeling are not post-production activities and require certification.		It seems to me if you are adding trims or accessories, then it is not 'Post Production'. Post production should mean completely manufactured and packaged and ready for sale to the final customer
A1 Definitions	Post-Production	Could say post production is when the garment is packed into a polybag or other packaging? (since it's packed in a bag, nothing else can be added onto that garment)	
Changed: "Post-Production: All activities that occur after final product manufacturing and before a product is sold to the final consumer (e.g. warehousing and distribution). Any addition of trims and accessories, packaging, and labeling are not post-production activities.			
A1 Definitions	Processor: Entity engaged in construction or transformation of a product, including the addition of trims		It seems GOTS differs between processing and manufacturing. Would be nice if TE and GOTS handle the same definition.

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	or accessories. Can also be referred to as a “manufacturer”.		
This was not changed to be in line with “Final Processor” definition. GOTS differentiates, but TE uses processing and manufacturing interchangeably.			
A1 Definitions	Records: The information in written, visual, or electronic form that documents the activities undertaken by a user to demonstrate accordance with this Standard.	Remove reference to “standard”	Maybe it not necessarily has to be related to the standard?
Changed to “...accordance with requirements.”			
A1 Definitions	Subcontractor:... Subcontractors and their relevant processing and manufacturing steps become listed on the Scope Certificate of the certified Organization assigning the certification.		Is that an option or must? There are clients who want to keep subcontractor information confidential to buyers.
No change. Subcontractors can be included in an addendum to the Scope Certificate if confidentiality is an issue.			
A1 Definitions	Trader: Entity trading (buying and selling) CCS Product in the supply chain between the original Claimed Material source and the retail merchant of the final product...		What if the ‘trader’ mediates between 2 factories? That also happens. Then it is not a trader because here it says ‘retailer merchant’?
No change. Original Claimed Material could refer to a farm and therefore covers any possible trader from original source to final retail. The main point is that they are just buying and selling with no processing done to the product.			
A3.3b	A3.3b Organizations are issued SCs based on an annual Audit cycle. <b>SCs expire and shall be renewed after successful reassessment by the CB .</b> The validity date of the SC shall begin after the date the certification decision is made and the Organization is notified.	A3.3b Organizations are issued SCs based on an annual Audit cycle. <b>SCs expire and shall be renewed after successful reassessment by the CB .</b> The validity date of the SC shall begin <b>on or</b> after the date <b>of the positive</b> certification decision. <del>is made and the Organization is notified.</del>	I understand this as, “when SC expires go for reassessment in order to get renewed certification.” it would better to make this statement more understandable
Changes were accepted and made as suggested.			
A3.4b	TCs may only be issued for CCS Products to Organizations that hold a valid SC and by the CB that issued the SC.	What does this mean? Does TC issued “TO” another certified company only?	
We were trying to say that only certified sellers can be issued a TC. They then would give a copy to their buyer, whether they are certified or not.			

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B4 Managing CCS Product after production	B4.2 Storing CCS Products	This sounds like it refers to products that are packaged and ready for sale to the consumer. Do they now have to be separated from non CCS products? How many third party warehouses are going to be willing to do this without raising their fees? I hate to keep harping on Amazon but all our small customers use Amazon for fulfilment making Amazon warehouses subject to this. So anyone who wants to take advantage of Amazon’s great fulfilment service will not be able to use the OCS logo.	
B4.2b	All other warehouses (i.e. in transit) shall be listed and may be inspected at the discretion of the CB.	What about Customs warehouses? Products are held on a regular basis both in country of origin and country of import. How do you enforce this rule?	
<p>The main intent of B4.2 is for unfinished goods that might get commingled or substituted. Finished product are usually packaged or separated anyway. As for Amazon -and other contracted warehouses performing logistical functions with no ownership of the CCS Product- we made the change in C3.1b that exempts them from the On-Site Audit requirement.</p>			
B4.2b	B4.2b, states “ <b>all warehouses for each production step shall be listed and inspected as part of the overall certification process to ensure protection from commingling or confusion with other materials...</b> ” But from your response to my last question this seems only to apply to storage during production, yet it is in Section B4. Managing CCS Product after production which implies those rules are in effect up to the final retailer.	Move to C3.1  Do not require post-production contracted warehousing to be subject to inspection. (no ownership)	Certified companies may have no control over whether CBs can enter a contracted warehouse and it adds to possible cost.
B4.2b	All shipments of CCS Products shall be labeled with identification that clearly links them to the relevant invoices or shipping documents. The name of the standard must appear clearly on each box or package.	Questions: What about mixed shipments of products? (ex. a box has certified and non-certified products in it)	

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<p>The products would have to be labelled individually or packaged separately from the non-certified product, in which case that packaging would need to be identified/labelled.</p>			
B4.2b	<p>Alternatively, this information can be presented on an accompanying document, as long as such document can be undeniably linked with the packaging, container or vehicle of the product.</p>	<p>what “information” do you want, just the name of the standard? Are you requiring other information? If so, can the information be sent digitally to the person receiving the shipment or does the document have to be printed?</p>	
<p>You need to demonstrate that you are able to identify which shipments are CCS Products and which products in that shipment are CCS. That can either be done with direct identifying marks, or a numerical system if you have the IT and can correlate them.</p>			
B4.2b	<p>All shipments of CCS Products shall be labeled with identification that clearly links them to the relevant invoices or shipping documents. The name of the standard must appear clearly on each box or package.</p>		<p>Is this section being written to allow for more flexibility?</p>
<p>The detailed list of all things that needed to be on a shipping container has been reduced to this language already.</p>			
C1.2 Audit Frequency	<p>On-Site Audits are to occur at least annually, within the calendar year, and within the validity period of the Scope Certificate.</p>	<p>Adding that CBs have the right to suspend certificates if the surveillance audit is not done on time or if the organization doesn’t cooperate for the surveillance?</p>	
<p>No change. Withdrawal of SCs is a part of B2.2 and C4.1a Manual Guidance and the TE Accreditation Procedures.</p>			
C1.2	<p>On-Site Audits are to occur at least annually, within the calendar year, and within the validity period of the Scope Certificate.</p>	<p>Questions: What happens if a brand is using the CCS for multiple standards (like RCS and RDS)? What would their audit schedule be like?</p>	<p>Add information about what happens when a brand is using the CCS for more than one TE standard.</p>
<p>If a standard is added, the site either waits to add it until the next on-site audit cycle, or they work with the CB to make the scheduled annual inspection timing work to be at the same time. Usually this would mean having an earlier inspection.</p>			

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<p>The CCS is not technically being assessed, just the RCS and RDS would be in your example. Certification is separate for each one, though there are possible efficiencies (e.g. if the audits are done at the same time).</p>			
C1.3 Non-Conformities and Certification Decisions	Certification decisions may be made by the CB up to two weeks after receiving notification of the correction of non-conformities from the Certification Organization. Non-conformities must be corrected within two months of the On-Site Audit. In the case of no non-conformities, certification decisions must be made within two months of the On-Site Audit.	<p>Add...</p> <p>Unannounced On-Site Audits are not affected by the 2 month limitation. Certification decisions do not affect the validity date for renewals.</p> <p>Add example in the manual.</p> <p>Clarify that unannounced inspections are in addition to audits, not a replacement.</p>	This ensures that the unannounced audit cannot occur more than 2 months prior to the SC expiration date.
C1.3	In case of no non-conformities, certification decisions must be made within two months of the On-Site Audit.	Why do they need two months if there are no non-conformities? That is inefficient. It also means that 9 months after I receive my certification I have to start arranging for a new audit because just getting a date for the audit often takes a long time. Then, if the CB happens to give me the cert within a month, I lose a month.	There should be a rule that the next cert starts when the last cert expires.
<p>Non-conformities have been broken into Major – must be corrected within 30 days – and Minor – must be corrected within 60 days. No months should be lost. There might be a delay in the first issuance of a SC, but renewals are just allowances of these days before the SC is withdrawn.</p>			
C1.3c	Major non-conformities shall be corrected within one month of the On-Site Audit.	How many days is a month? 30 or 31? Definition in days is more clear.	
<p>All instances of month have been changed to be 30 days to be more specific.</p>			
C1.3c	Major non-conformities shall be corrected within one months of the On-Site Audit		
<p>An extension under certain circumstances was added to minor non-conformities manual guidance. Major non-conformities are those that compromise the integrity of the Claimed Material and are therefore required to be corrected quickly.</p>			
C2.2b	Traders with an annual turnover of less	– Change “OCS goods” to “CCS goods” (done)	– Change to a unit-based threshold because the value of

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	than \$10,000 of OCS goods are exempt from the certification obligation; provided that they do not (re-)pack or (re-)label CCS Product. Exempted entities with less than \$10,000 annual turnover of CCS Product must register with an Approved Certification Body and must inform the Certification Body immediately once their annual turnover exceeds \$10,000, or once they plan to (re-)pack or (re-)label CCS Product.	– Add a unit-based threshold instead of a dollar value threshold – for example if the trader’s annual turnover is less than 1,000 units of CCS goods, they are exempt. You could also add a clause like “if the trader’s annual turnover is less than 1,000 units (but no greater than \$25,000 or \$30,000 in value), they are exempt.”	products will vary so greatly amongst your standards. Wool and down products are more expensive so traders may reach the \$10,000 limit by selling only 200 units of products. You have much less leverage asking a trader to take part in the CCS when they’re only selling 200 units.
C2.2b			Value vs volume – different schemes have different views on the floor value before certification obligations kick in – perhaps a volume is more future proof and gets around the changing values ( or relative values of the product) – UNLESS there are more risks to integrity to high value product and a related to desire to bring it into the system earlier – could a metric – cost to volume ratio provide a useful alternative??
C2.2b			You may want to specify if this is calculated based on the FOB cost of the goods, the wholesale price, the retail price, or the price the trader is purchasing the products at, etc.
			Should this threshold be a number of units (e.g. 1000 units)? Wool and down products are more expensive than cotton.
No change as discussion did not yield a better alternative for these small traders. If products are more expensive then they represent more of a risk of fraud, so the natural limiting factor of products in a \$10,000 reduces this risk. The \$10,000 level was not changed to units because of the potential for a small number of units representing a very high valued product (as suggested). Some products could be sold in small quantities but represent a high percentage of the market (e.g. precious metals).			
C2.2B	... once they plan to (re-)pack or (re-)label CCS Product.	Clarify “repack” – Traders often have to repack because they aren’t selling the whole carton/box. Wouldn’t this automatically disqualify most traders?	This might need to be more specific. What if the trader has to open a carton and pull out 50 garments to ship to a customer? Are they automatically disqualified if they have to open cartons?
C2.2B			I think you need to clarify what is meant by ‘repackage’ This could be interpreted to be taking cartons containing 100 CCS products and breaking them up into smaller cartons for onward sales. I assume you mean they don’t add sewn in labels or hangtags. Or they don’t group

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			individual products together in sets with products that are not certified. Not sure how to word this more clearly.
<p>Changed to "...or if they plan to repackage CCS Product." Manual Guidance to C3.1b further distinguishes <i>repackaging</i> -from <i>repacking</i>- as individual packaging is removed from products or applying hangtags...</p>			
C2.3c MANUAL GUIDANCE:	Examples of core processing operations for textiles include ginning, spinning, knitting or weaving, and cut and sew, which all must be certified.		The manual guidance also mentions cut and sewing as core process but we consider garmenting is mentioned as non-core textile process.
<p>No change. Cut and sew/garmenting is considered a core process by TE and GOTS and should be physically visited.</p>			
C3.1	External storage units being used for CCS Products shall be declared and will be subject to inspection.	<p>How do you define external storage units? For example, Williams Sonoma owns all their distribution centers/storage units, but the centers are physically are separate from their retail stores. WSI only sells through its own retail stores or online, delivering from their storage unit.</p> <ol style="list-style-type: none"> <li>1. Do they have to keep CCS Products separate from non CCS Products?</li> <li>2. Do they have to declare all their distribution centers and are the DC's subject to audit?</li> <li>3. Does WSI have to be certified to label their products? –they are not planning to label their products but I'd still like to know how these rules would affect them.</li> </ol> <p>Now that all buyers of CCS goods now need to be either individually certified or certified as part of a network- unless they are the last Mom and Pop store to sell the goods. If the Mom and Pop store has an a.) self-owned warehouse or b.) third party warehouse, how do these rules affect them?</p>	
<p>Moved to Manual Guidance and clarified with "C3.1a External storage units being used for CCS Products during production shall be declared and may be subject to On-Site audit. Production sites are those that are transforming inputs into a new product (e.g. a dye house uses a warehouse to store goods-in-process at a different physical</p>			

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location).”			
C3.3	<p><b>A3.3a</b> The Organization shall provide the CB with any updated and accurate information deemed necessary for the purposes of the On-Site Audit, including but not limited to:</p> <ul style="list-style-type: none"> <li>the name, location, and activity being performed at each site;</li> <li>a diagram and description of the <b>manufacturing</b> process showing all material and product flows;</li> </ul>	<ul style="list-style-type: none"> <li>Change “A3.3a” to “C3.3a” (done)</li> <li>Remove “manufacturing”</li> </ul>	– Not all using the CCS will be manufacturers
Changed to “a diagram and description of the <del>manufacturing process showing all material and product flows;</del> ”			
C4.1	TCs	OCS certified sites should be required to send TCs.	If a certified garment manufacturer is selling just “organic” clothing that was made with OCS certified inputs, there is a danger of double selling.
It was not made mandatory to have TCs for all sales from certified sites because the annual On-Site Audit covers all Claimed Material sales as part of the volume reconciliation.			
C4.1	A TC that states that the products have been produced according to the CCS standard shall accompany all products sold to other businesses.	“A TC that states that the products have been produced according to the CCS standard shall accompany all products that the certified organization sells to other businesses unless the products are being sold to the final retailer.”	TCs aren’t required for final retailers unless requested so changing the wording would reflect that better.
Language changed in C4.1 to be clearer.			
C4.1	Transaction Certificates		Recent discussions with GOTS have indicated some relaxation of TC controls may be permissible in certain cases – would be good to ensure TE and GOTS remain on the same page about the requirements of TCs especially given the burden they can place on operators.
TE and GOTS stay in alignment in regards to TC policies. The CCS template and policy will be updated to match GOTS’s latest policy released.			
C4.1			<p>Is it only retailers that can opt out of a TC?</p> <p>One of the questions we have been asked by our CB is why we issue so few transaction certificates to our buyers. The reason is our buyers do not want to pay for them. They want to see our transaction certificates from our suppliers and they want to see our certification.</p>



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			I'd like to see clarification here that choosing not to request a TC is also an option of a brand or anyone. Or that manufacturers are not required to issue a TC if their customer doesn't require it.
TCs are a fundamental part of the chain of custody. It is the only control for specific goods.			
C4.1	TCs	define 'timely manner' for applying for the TC	
Timely manner appears in many places. There are too many possible scenarios to restrict to a certain time frame.			
C4.2c Calculation	All calculations are done based on the weight of the materials.		How would we do a weight-based volume reconciliation on sewn garments?
Changed to "All volume reconciliation calculations are done based on the weight of the materials, except in Post-Production sites where number of items may be more appropriate."			
D1	Batch Codes		For the Batch Codes portion: The way the Batch Code sections are currently written, since the Organization applying the Batch Code Labels is the one with the responsibility of maintaining records and managing the labels, most big brands probably wouldn't qualify for this option. Final processors (garment factories) do apply the security labels with the unique serial numbers, but brands are the ones who can go into the online system and look up serial numbers to check information about the garments. I know the original intent of this section is for factories that produce blanks and other 3rd party goods so that's why it's written the way it is, but if you also intended it to be an option for brands, in a way it seems like the brand would be putting responsibility for the integrity of the products onto the factories.
All Post-Production options have now been rewritten to be for the Brands only. They are responsible for the integrity of the final product.			
D1 Batch Codes	Product description (e.g. SKU #, Product #, Style #)		I don't see a need to put a product description on the product. This would be expensive for people doing several products in one production batch. Instead of one label they would need several. For example they were making shirts and skirts in the same production run out

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			of the same material; they would need one label that says 'skirt' and another that says 'shirt'?
No change. It is necessary to be able to distinguish product from each other on a TC, even within the same batch. A purchase order may have multiple product types (shirts and skirts), which is why the product description is necessary.			
Section D		Make it clear that the BNC does not require the use of batch codes.	
Section D Introduction now says "Each exemption does not require compliance with the requirements of the other exemptions."			
D2 – 100% Claimed Material	Certification ends with the Brand	May want to add some language to clarify that the brand's entire distribution network doesn't have to be certified.	
Each Post-Production section has "Qualifications" and "Exemptions" specifically listed out now.			
D2.3	<p>The Batch Code Label information shall appear in the following order with any additional information or numbers (e.g. as required by the Final Processor or Brand) appearing afterwards, so as to not confuse anyone identifying the source of the CCS Product:</p> <ol style="list-style-type: none"> <li>1. CB acronym code (assigned by TE) and Final Processor Licensing Number as supplied by their CB</li> <li>2. Batch: <i>Unique Batch Code Number</i></li> <li>3. <i>Optional Information (Example below of SKU and PO numbers provided by the Brand)</i></li> </ol>	<p>Questions:            Can the information required for the batch code label be covered on multiple labels sewn into the garment (is it acceptable to have the information on a combination of 2 labels?            (for example, the PO # and SKU # may be on one label with the rest of the information on another)</p>	
"CB 1234567 and Batch: 1234ABCD" have to be on the same label, but PO and SKU are optional examples that can appear elsewhere. They are included here to show the proper order so as to not confuse an auditor looking specifically for the CB and batch information.			
The order is no longer required apart from the first line- "In this order: TE Standard acronym, CB acronym code (assigned by TE), and Brand's Licensing Number as supplied by their CB.			
D2.5	TCs with Batch Code CCS Products		I think we can safely presume that if multiple shipments can occur from a single batch then a single batch can easily have multiple clients - bulk product production in other industry areas share that capability. Likely to be most difficult to manage in cases where a batch is

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			produce, stored and then broken into several lots for delivery to different clients as there is no way to know at point of labelling if that batch requires one or multiple batch codes
Batch and lot numbers are still permissible, but Purchase Order numbers are unique to buyers and are now allowed. The CBs will decide which is more appropriate given the situation.			
D3	BNC	The BNC may not be possible for smaller brands due to cost and limited value for ensuring compliance	
Contracted warehouses have been removed from On-Site audit possibility, but are still BNC's responsibility. This lowers costs.			
D3	<b>Final Processor:</b> The certified Organization that performs the final point of manufacturing, including any addition of trims or accessories that will be labeled for sale to consumers. The Organization shall hold a valid CCS Scope Certificate.	wording here is a little confusing	
Updated definition - <b>Final Processor:</b> The certified Organization that performs the final point of product transformation – including any addition of hangtags or product labelling that indicates Certification – before sale to consumers.			
D3	Outgoing TCs shall be sent from the Final Processor to the BNC for all orders. TCs are issued by the relevant Certification Body.	change to “brand”?; just for extra clarity since the “BNC” isn’t an actual entity	
Changed to: “Brands shall receive valid TCs for all CCS Product purchased (from the Final Processors to the BC; issued by the relevant CB).			
D3- Brand Network Certification	Brand Distribution Network (example)		This chart may lead people to think products go linearly from processor to licensee to DC to wholesaler, when really there are many different product flows.
Chart removed.			
D3 – Brand Network Certification	4. Network Levels	Please elaborate on the calculations for the number of audits needed for the Network Levels. This is very confusing. Annual remote audits of 0.5 x square root of total number of Independent BNC Participants within the BNC	D3 – Brand Network Certification

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<a href="#">Audit requirements are in bullet points by level.</a>			
D3 – Brand Network Certification	5. Auditing Check that the Brand has copies of the TCs for all certified goods, and that they supply TCs to retailers upon request.		This timing might not work out. For example, our factories are still shipping FA 15 products, but we’ve already had our ICS audit. In addition, we gave our factories a 45-day shipping window for each TC. (and I think the standard says 90 days?)
<a href="#">Changed to “Check that the Brand has copies of the TCs for all certified goods, except where TCs are in process or awaiting multiple shipment deadlines, and that they supply TCs to retailers upon request.”</a>			
D3 – Brand Network Certification	6. Application of the BNC - Control of Labeling	I think this is a great idea! What is the application process? Will brands need to inform the CB about their distribution network and how it works? They should.	D3 – Brand Network Certification
<a href="#">Brand is required to report the network details.</a>			
D3.2	Qualifications: The Brand shall apply for BNC with a Certification Body. The following qualifications shall be met and verified by a Certification Body:  1. All certified products shall be labeled with standard’s logo and CB reference number at the Final Processor: <u>no labeling can occur after this point, unless it is by a party that holds a valid Scope Certificate.</u>	Add a line specifying that if the product-specific claim is an on-product label, then the certified products shall be labeled with the standard’s logo and CB reference number, etc.  Change it to say “CB reference number or name”	Not all products being certified under the CCS will be labeled on-product. Since the CCS applies for all product-specific claims, the claim could be on, for ex., an e-commerce website or a sales lookbook.  Isn’t the name of the CB allowed as well?
<a href="#">Labeling and required wording is now referencing the appropriate <i>Logo Use and Labeling Guides</i> in B3.5d. The <i>OCS Logo Use and Claims Guide</i> covers this.</a>			
D3.6	Control of Labeling	Add a timeframe for approving the Label Releases, perhaps 5 business days?	Labeling is usually very time sensitive and there may not be much time to revise artwork after the Label Release has been submitted so a time period for approval would be helpful.
<a href="#">The Label Release was left a general requirement for on-product <i>Labelling in the OCS Logo Use and Claims Guide</i>.</a>			
D3.6	Transaction Certificates from Final Processors  Brands will be required to collect Transaction Certificates for all certified	Change to “manufacturers” (done)  “Brands <del>will be</del> are required to collect Transaction Certificates for all certified products	Brands only need to send TCs to traders and final retailers that request them, correct? <a href="#">Yes</a>

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	<p>products under their Brand that are shipped from the Final Processors to any BNC Participant sites. The <b>manufactures</b> will send the TCs to the Brand. The Consignee will be the Distribution Site.</p>	<p>under their Brand that are shipped from the Final Processors. <del>to any BNC Participant sites that</del> <b>request them."</b></p>	
<p>D3.5b has been reworded that Final Processors are the ones required to request a TC for products they ship to BNCs.</p>			